

Hearing Date: December 14, 2011 at 10:00 a.m. (Eastern Time)
Objection Deadline: December 7, 2011 at 4:00 p.m. (Eastern Time)

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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<i>In re</i>)	Chapter 11
)	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,)	Case No. 08-13555 (JMP)
)	
Debtors.)	(Jointly Administered)
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**NOTICE OF MOTION FOR ENTRY OF AN ORDER PURSUANT TO SECTION 362(d)
OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 4001 TO LIFT THE
AUTOMATIC STAY TO PERMIT WALWILHAL ASSOCIATES, LLC TO
PROSECUTE CERTAIN CAUSES OF ACTION IN STATE COURT**

PLEASE TAKE NOTICE that a hearing on the attached motion and its supporting declaration and exhibits (the “Motion”) to permit Walwilhal Associates, LLC (“Walwilhal”) to file, prosecute and obtain judgment on causes of action arising under state law in the Supreme Court of the State of New York, County of New York (“State Court”), against debtor Lehman Brothers Holdings Inc., or its State Court-appointed Receiver, all as more fully described in the Motion, will be held before the Honorable James M. Peck, United States Bankruptcy Judge, in Courtroom 601 of the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”), at One Bowling Green, New York, New York 10004-1408 on **December 14, 2011 at 10:00 a.m. (Prevailing Eastern Time)** (the “Hearing”).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and the Local Rules of the Bankruptcy Court for the Southern District of New York, shall set forth the name of the objecting party, the basis for the objection and the specific grounds thereof, shall be filed with the Court electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court’s case filing system and by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with two hard copies delivered directly to Chambers), and shall be served upon: (i) the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) Stroock & Stroock & Lavan LLP, 180 Maiden Lane, New York, New York 10038, Attn: Kenneth Pasquale, Esq., attorneys for Walwilhal; (iii) Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153, Attn: Richard P. Krasnow, Esq., attorneys for the Debtors; (iv) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004, Attn: Andy Velez- Rivera, Esq., Paul Schwartzberg, Esq., B Brian Masumoto, Esq., Linda Riffkin, Esq., and Tracy Hope Davis, Esq.; and (v) Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005, Attn: Dennis F. Dunne, Esq., Dennis O’Donnell, Esq., and Evan Fleck, Esq., attorneys for the Official Committee of Unsecured Creditors appointed in these cases, so as to be so filed and received by no later than **December 7, 2011 at 4:00 p.m. (Prevailing Eastern Time)** (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE that the date of the Hearing may be adjourned to a future date and or time in open court without further notice.

PLEASE TAKE FURTHER NOTICE that if an objection to the Motion is not received by the Objection Deadline, the relief requested therein shall be deemed unopposed, and may be granted by the Bankruptcy Court without a hearing.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing and that failure to appear may result in relief being granted or denied upon default.

Dated: New York, New York
November 22, 2011

STROOCK & STROOCK & LAVAN LLP

By: /s/ Kenneth Pasquale
Kenneth Pasquale

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